

10/31/2019

SOUTHERN DISTRICT OF SOUTH CAROLINA

MOTION TO CONFIRM ARBITRATION AWARD

Based upon the award of the Arbitrator, as provided in the attached documents, Petitioner requests that the Court confirm the arbitration award as a judgment and enter judgment against the Respondents(s) in the amount(s) of \$6,132,000,000.00

Respectfully submitted,

Petitioner

Petitioner(s),

NATHANIEL HALLMAN, ET AL (Contract No.:SAANH-A107A-070819-MEM/Saa-3491R8STR-76FK2LIWKLD-S8FH449SYN/A107A-NH-001)

vs.

Respondents(s).

UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES ATTORNEY GENERAL WILLIAM BARR, ET AL

HENRY MC MASTER, ET AL, GOVERNOR OF SOUTH CAROLINA

The undersigned arbitrator:

1. Acknowledges that all documents and evidence submitted in this arbitration have been reviewed and considered.

2. Finds that the Petitioner has filed with SITCOM
ARBITRATION] and properly and timely served on Respondent an arbitration claim.

3. Finds that Respondent has responded to this claim as required by the applicable arbitration code of procedure.

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4. Has conducted a hearing in accord with the applicable arbitration code of procedure.

5. Finds that the evidence submitted in this case supports the issuance of this award.

6. Issues an Award in favor of the Petitioner and against Respondent in the amount of \$6,132,000,000.00 as damages, \$ 6,132,000,000.00 as recoverable arbitration fees, and \$ 6,132,000,000.00 as reasonable attorney fees, for a total award of \$ 6,132,000,000.00
Dated: October 18th, 2019

AFFIDAVIT

Petitioner(s),

NATHANIEL HALLMAN, ET AL

vs.

Respondent(s).

UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES ATTORNEY GENERAL WILLIAM BARR, ET AL

HENRY MC MASTER, ET AL, GOVERNOR OF SOUTH CAROLINA

Affiant, being duly sworn under oath, states:

I am [Nathaniel Hallman I.

An arbitration award was issued on JULY 8TH

2019 by Arbitrator [MARK MOFFETT] in [Laurel, Mississippi]. An

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This arbitration involved the following parties: MARK MOFFETT, SANDRA GOULETTE These parties signed and agreed to this arbitration as evidenced by an arbitration agreement attached to this affidavit as Exhibit B.

The arbitration award was obtained pursuant to the agreement of the parties, the rules of the arbitration organization, and the law.

Signature

10/18/2019

ORDER

Petitioner (s)'

NATHANIEL HALLMAN, ET AL

Respondent (s).

UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES ATTORNEY GENERAL WILLIAM BARR, ET AL

HENRY MC MASTER, ET AL GOVERNOR OF SOUTH CAROLINA

This Court has considered the request of Petitioner to confirm an arbitration award and has reviewed all documents.

THIS COURT ORDER'S that the arbitration award issued in this case in

the amount of \$6,132,000,000.00 Six Billion One Hundred Thirty Two Million Dollars And Zero Cents In United States Currency(USC)) be

confirmed and that a judgment be entered immediately in the amount of \$6,132,000,000.00(Six Billion One Hundred Thirty Two Million Dollar's And Zero Cent's)-

[Six Billion One Hundred and Thirty Two Million Dollar's and Zero cents in United States Currency] in favor of [NATHANIEL HALLMAN] and against [UNITED

STATES DEPARTMENT OF JUSTICE, UNITED STATES ATTORNEY, ATTORNEY GENERAL WILLIAM BARR, ET AL, HENRY MC MASTER GOVERNOR OF THE STATE OF SOUTH CAROLINA damages due to Respondent. On [July 8,2019] the arbitrator(s) issued Petitioner an award of \$6,132,000,000.00 Petitioner now moves to confirm this award.

Explanation

The Federal Arbitration Act, 9 U.S.C. § 9, provides that "within one year after the award is made any party to the arbitration may apply to the court so specified for an order confirming the award, and thereupon the court must grant such an order unless the award is vacated, modified, or corrected. If Accordingly, this court has the obligation to confirm Petitioner's arbitration award into a judgment. See Doctor's Assocs., Inc. v. Cassarotto , 517 U.S. 681 (1996) (stating the purpose of the Federal Arbitration Act is to ensure that private agreements to arbitrate are enforced); Allied-Bruce Terminax Cos. v. Dobson, 513 U.S. 265 (1995)

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("[T]he basic purpose of the Federal Arbitration Act is to overcome courts' refusals to enforce agreements to arbitrate. "); Southland Corp. v. Keating,

465 U.S. 1,

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15-16 (1984) (holding the Federal Arbitration Act preempts state law and state courts cannot apply state statutes that invalidate arbitration agreements).

The standard of review of an arbitrator's decision by the court is very narrow. The scope of review is limited, and the court may not examine the merits of the decision except to the extent that the award exceeds the agreement of the parties. See *Burchell v. Marsh*, 58 U.S. 344, 349 (1854) (stating the appropriate scope of judicial review is whether the award is the honest decision of the arbitrator, made within the scope of the arbitrator's power, and that a court will not otherwise set aside an award for error). See also *D.H. Blair & Co. v. Gottdiener*, 462 F.3d 95, 110 (2d Cir. 2006)

(quoting *Florasynth, Inc. v. Pickholz*, 750 F.2d 171, 176 (2d Cir. 1984)) (" Normally, confirmation of an arbitration award is 'a summary proceeding that merely makes what is already a final arbitration award a judgment of the court' "); *Coast Trading Co. v. Pacific Molasses Co.*, 681 F.2d 1195, 1197-98 (9th Cir. 1982).

Here, the arbitrator(s), having considered the pleadings and other evidence presented at the hearing, determined that Respondent was liable to Petitioner. There are no grounds for vacating, modifying, or correcting an

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arbitration award enumerated in 9 U.S.C. which exist, and Respondent has not made any motion to vacate, modify, or correct the award.

Conclusion

Petitioner respectfully requests an order confirming an arbitration award into a judgment in the amount of \$ 6,132,000,000.00 for Petitioner [NATHANIEL HALLMAN] and against Respondent. UNITED STATES DEPARTMENT OF JUSTICE, UNITED STATES ATTORNEY GENERAL WILLIAM BARR, ET AL, HENRY MC MASTER, ET AL GOVERNOR OF SOUTH CAROLINA

Dated:

10/31/2019

Petitioner

Sent from Mail for Windows 10

By: Nathaniel J. Hallman ucc7-308